

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RAHEEM JOHNSON,

Plaintiff

V.

Civil Action

DEPUTY TRITT, et al.,

1:18-cv-0203

Defendant's

CONCISE STATEMENT OF MATERIAL FACTS

Plaintiff admits that (1) through (13) should be deemed as admitted.

14. Plaintiff showed up to every appointment, as it was mandatory for inmates to be placed on medical lay in until their seen by medical if their on the call out.

15. Admitted.

16. Plaintiff was seen and informed Mr. Iannuzzi about being in pain and never refused any medication.

17. Dr. Pandya never considered placing plaintiff closer to shower and refused plaintiff pain medication at this visit.

18. Plaintiff never was called by medical for appointment.

19 to 20, is admitted.

21. If plaintiff deferred an examination at the visit, how was it possible for Mr. Iannuzzi to make an assessment?

22. Nurse Kuras notation is false.

23. Not sure about that.

24. Dr. Pandya statement about PTO brace was false as you have to turn in old brace to receive a new one, and plaintiff had received a new brace since pto.

25. Correct.

26. don't know if this happened.

27. Plaintiff was in pain and couldn't do to much of nothing.

28. Admitted.

29. Plaintiff had restrictions prior to Dr. Pandya placing restrictions. It may be Dr. Pandya renewed them.

30. She did speak with plaintiff but plaintiff doesn't recall telling Ms. Holly about 3 car accidents.

31, to 43, is admitted by plaintiff.

44. Plaintiff was never called for stockinette.

45. Plaintiff admits.

46. Plaintiff seen Dr. Pandya but never requested to be sent to them prisons as plaintiff was kicked out of Houtzdale in 2010, and received a promotional transfer from S.C.I. Somerset to Frackville.

47. 47 to 52, is admitted.

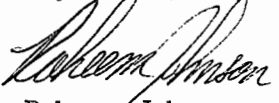
53. Dr. Pandya was wrong as there was swelling that's the reason he ordered another MRI.

54. 54 to 56, is admitted by plaintiff.

57. Dr. Pandya never informed plaintiff to walk without crutches as plaintiff was at a point where it was impossible due to pain and both knee's now giving out on plaitiff.

58. 58, is admitted.

Respectfully submitted;


Raheem Johnson

CERTIFICATE OF SERVICE

I, Raheem Johnson, pro se Plaintiff, hereby certify that on this date 6/3/2021; served a true and correct copy of the forgoing, CONCISE STATEMENT OF MATERIAL FACTS, IN PLAINTIFF'S BRIEF IN RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT, upon the following by first class mail.

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Date.6/3/2021.

Respectfully submitted;


Raheem Johnson